

Exhibit A

AFFIDAVIT OF CARMEN BIN LADIN

PERSONALLY APPEARED BEFORE ME, Carmen Bin Ladin, who being duly sworn hereby states and affirms:

1. I am over the age of 18 and I make this statement from my own personal knowledge.
2. I was born in Switzerland and have always maintained my Swiss citizenship.
3. In 1973, I met Osama bin Laden's brother, Yeslam bin Ladin. We fell in love and in December of 1973 we both moved to the United States and studied at the University of Southern California.
4. After a courtship of one year, I married Yeslam bin Ladin ("or Yeslam") in Jeddah, Saudi Arabia in August of 1974. We returned to California after the wedding.
5. In 1976, Yeslam was anxious to return to Saudi Arabia during the oil boom because of new business opportunities in the country. We moved to Saudi Arabia and settled in Jeddah.
6. Over the course of our marriage we gave birth to three daughters.
7. I authored a book entitled *Inside the Kingdom My Life in Saudi Arabia* which was published in the United States in 2004. In the book, I describe my experiences living in Saudi Arabia and my personal knowledge of the bin Laden family including Yeslam bin Ladin.
8. I also published an open letter in *Le Monde* for the first memorial of the September 11th attacks. The letter was entitled "A Letter to the World I Belong To" published in *Le Monde* on September 11, 2002. (The letter is attached as Exhibit 1).
9. During my nine years in the kingdom of Saudi Arabia (1976-1985), I learned and analyzed the mechanisms of that opaque society. Most Saudis come across as charming, softly-spoken, polite and even kind, as long as you do not question their

culture and convictions and do not jeopardize their interests. I had a privileged relationship with my husband Yeslam because unlike the majority of Saudi husbands he turned to me for advice regarding his personal relationships with his brothers, his career, his role within the Bin Laden organization and his private business.

10. Yeslam and I began divorce proceedings in Switzerland in 1994. The divorce procedure in the Geneva courts, which has lasted for more than ten years, has been characterized by misleading statements from Yeslam and outright lies.
11. Yeslam and the Bin Laden clan have complete disdain for any legal systems other than their own. As evidence, officials of the Mohammad Bin Laden Organization and the Saudi Binladin Group have refused physically to appear before the Swiss Courts and their affidavits have been misleading, incomplete and untruthful.
12. This is an example of how Yeslam and the bin Laden brothers protect one another through false affidavits. In addition, they move assets between one another through the hundreds of companies that they own and manage throughout the World to protect their financial and personal interests.
13. Yeslam has endeavored to hide the vast extent of his wealth. Legal requests for evidence from Saudi Arabia were returned unanswered. Therefore, I found myself obliged to begin a private investigation into Yeslam's and the bin Laden family's holdings. I have investigated these financial activities for the past 8 years and discovered Yeslam's and the Bin Laden family's management of hundreds of various companies in the United States, Europe and offshore.
14. My investigation files, a small portion of which were filed before the Swiss courts, reveal that Yeslam alone, contrary to his statements before the Swiss courts, has over 76 companies, at least 11 of which are U.S. businesses. Yeslam uses this network of

businesses to conduct his personal and business activities in the United States. One of these businesses is the Saudi Investment Company S.A. (SICO) which Yeslam began and is the Chairman of.

15. Yeslam bin Ladin denied before a Swiss court and on several occasions in the press that SICO has no subsidiaries in Switzerland or abroad, including offshore.¹
16. However, in one of SICO's advertisements it states that it has significant real estate investments in the United States. In another advertisement, SICO stated that they created a department which specialized in markets in the United States. "Our main target was to dispose of the idea that one has to live on Wall Street in order to make money." (Attached as Exhibit 2).
17. As early as 1983, SICO stated that "negotiations with Pershing, a leading clearing house on Wall Street and a subsidiary of Donaldson, Lufkin and Jenrette, were successfully completed allowing SICO to offer its customers [and thus, Yeslam] unlimited access to the United States." (Exhibit 2).
18. SICO advertisements further state that "together with Daniel Realty Corporation, one of the leading US real estate firms, we [SICO] also created a unique concept of investing in American property." SICO advertisements further state that: "the purchasing power of the Group exceeds 100 Million US dollars." Through SICO, Yeslam conducted significant real estate business in the United States. (Exhibit 2)
19. In addition, in 1984, "SICO SA also established SICO Properties NV, a U.S. real estate trust managed by Daniel Realty Corp., one of the leading property managers in the U.S. and a subsidiary of Flur Corp." Attached as Exhibit 3.

¹ Ian Hanel, "Bin Laden, Serious Embarrassments of a Brother" Le Point (February 8, 2002).

20. Attached as Exhibit 4 is a document from Saudi Investors, Inc. which describes some of Yeslam's business activities in the United States. In addition to these businesses, I am aware through my investigation that Yeslam has numerous other business interests in the United States. Yeslam uses businesses to conduct his activities in the United States.
21. Yeslam's lawyers in Switzerland pled that through 1986 Yeslam played a critical role and was given several important functions in the bin Laden family construction companies. His salary per year at the time, according to Yeslam's lawyer, was three million Saudi Riyals. As late as 1999, Yeslam declared shares in the Saudi Binladin Group in his tax forms. Yeslam has a continuing role with the bin Laden organizations, businesses and companies through 2005.
22. In addition, Yeslam has denied in the press that SICO has any relationship with the Saudi Binladin Group; however, his lawyer stated in 1994 that Yeslam purchased a plane in 1993 in the name of SICO which was used for certain clients who are members of the Saudi Binladin Group. This is one example among many of Yeslam's and SICO's continuing and ongoing connection to the Saudi Binladin Group.
23. I also have first hand experience on how the bin Laden brothers transfer assets between one another in order to evade detection. For example, Yeslam transferred property he owned in California to his brother Ibrahim in order to avoid distribution of an asset.
24. After my divorce with Yeslam was filed, I discovered that Yeslam bin Ladin owned a home at 634 Stone Canyon Road in Los Angeles, California. In 1998, I brought suit against Yeslam in California seeking distribution of this asset. Soon thereafter,

Yeslam transferred ownership of this property to his brother Ibrahim to avoid equitable distribution of the property.

25. Yeslam's lawyer stated in divorce proceedings in Switzerland that Yeslam was holding the property in order that Ibrahim could avoid tax liabilities. Based on my observation and experience during my long marriage to Yeslam and based on my familiarity with his business transactions and familial relationships, the Canyon road property was merely transferred between Ibrahim and Yeslam in order to suit their interests at the moment in order to protect their personal and financial interests. **This is the common practice of the bin Laden brothers to switch assets between one another at their convenience to protect their interests.**
26. Yeslam also routinely used SICO for his personal affairs. For example, he paid my alimony in the name of SICO, paid for my children's education in the name of SICO and purchased private automobiles in the name of SICO. (Attached as Exhibit 5 is a copy of a financial transfer from SICO to me for the payment of alimony).
27. In or about 1979, I met Osama bin Laden at my home in Saudi Arabia. He is tall with a slight build. Osama has a stern and commanding presence. Osama was revered by Yeslam and all of the bin Laden family because of his fierce forbidding piety.
28. While living in Saudi Arabia, I was not permitted in public without being completely covered with clothing. Indoors, however, I was allowed to show my face. When I first met Osama bin Laden, I greeted him at my door with my face uncovered. Osama froze in shock because he could not bear to see my naked face.
29. Since September 11th and in his affidavit in the U.S. 9/11 case, Yeslam has maintained that he only saw Osama on a few occasions and only at family gatherings. This statement is not truthful. When I met Osama at my home in Saudi Arabia he

was visiting Yeslam with his nephew to discuss personal business. It was not a family affair.

30. Moreover, as described in more detail below, the bin Laden family including Yeslam and Osama were very close. In spite of Yeslam's recent claims, and based on my experiences in Saudi Arabia, there is no distinction in Saudi society between "half" brothers. Consistent with this practice, Yeslam and Osama have never treated one another as "half" brothers.
31. Osama was in his late twenties at the time and a student at Jeddah's King Abdulaziz University. In the early 1980's Osama left Saudi Arabia and fought in Afghanistan against the Russians. Through Osama's experiences in Afghanistan he became a national hero, a religious mentor to the bin Laden clan and the personal protégé of King Fahd.
32. After the outbreak of the Gulf War in 1991, Osama offered to raise an army to fight against Saddam Hussein. King Fahd declined Osama's offer and chose to have the Americans assist in protecting Saudi Arabia. After this perceived rebuke, Osama turned against the Americans for sending troops to Saudi Arabia.
33. In fact, in 1996 and in 1998, Osama bin Laden declared war on the United States. He stated that:

"We--with God's help--call on every Muslim who believes in God and wishes to be rewarded to comply with God's order to kill Americans and plunder their money wherever and whenever they find it. We also call on Muslim Ulema, leaders, youths and soldiers to launch the raid on Satan's U.S. troops and the devil's supporters and allying with them, and to displace those who are behind them so that they may learn a lesson."

34. Osama bin Laden's fatwas were well known throughout Saudi Arabia and the Middle East. Of course, Yeslam and the bin Laden family were aware of Osama's statements before they were publicly made.
35. In order to protect their business interests around the World, the bin Laden family downplayed their ties with Osama bin Laden. In private, however, they remained extremely close to him and supported him financially. The clan ties are sacred. The bin Laden's have not turned their back on Osama and never will. The bin Ladens follow the old Saudi maxim "Me and my brother against my cousin, but me and my cousin against the stranger."
36. As Osama's terrorist attacks against the west intensified and were publicized it became important for Yeslam to obtain Swiss citizenship. This is evidence that Yeslam was aware of Osama's threat to the West. In our two decade marriage, Yeslam was never interested in becoming a Swiss citizen. As I am Swiss, it would have been very easy for him to attain this citizenship earlier, during our marriage. Nevertheless, he remained uninterested until after bin Laden's attacks against the West. Yeslam became a Swiss citizen in May of 2001—four months before the September 11th attacks.
37. Yeslam claimed publicly in the Swiss press that "I want to stay in Geneva because of my children." This statement is completely untrue. Even though we all lived in Geneva, Yeslam has refused any contact with his daughters, nor has he shown the slightest interest in them. I am convinced that his desire for Swiss nationality has more to do with protecting his business interests in this tense international climate.
38. Yeslam Bin Ladin is an international businessman. He travels extensively and has property and financial holdings in many areas of the World, including in the United

States. The following statements are from my book and I affirm them as true and accurate for purposes of this litigation:

"The only difference between Saudi Islam and that of the ultra-hardline Afghan Taliban is the opulence and private self-indulgence of the al-Sauds. The Saudis are the Taliban, in luxury."

"The Saudis fund movements to export their strict Wahhabbi form of Islam to the outside World."

"There is simply no possibility that the government, or Saudi society, could ever be divorced from the strict rules of Wahhabi Islam."

"Saudi Arabian Islam is an enormous, very wealthy power that seeks to change the World, and it stretches far outside the borders of that otherwise firmly closed country."

"Naturally, the Bin Laden clan is prominent among those courtiers {the al-Sauds} today."

39. Based on my observation and experience, Osama bin Laden was advised to leave Saudi Arabia in 1994 not because he was stripped of his citizenship but because he criticized "the loose living of some of the Saudi princes." My ex-husband, Yeslam bin Ladin, and the entire bin Laden family were aware of the extremist intentions of Osama bin Laden. In 1994, Yeslam told me that:

Osama had gone into exile in Sudan, Yeslam told me. He had a group of armed followers, and tanks that guarded his compound. Yeslam believed that when Crown Prince Abdullah took over the throne Osama's star would rise and Bakr's would fade.

40. Ibrahim bin Laden said to me "No matter how right you are, Carmen, my brothers are never wrong." The family bonds of the bin Laden family are extremely close.

41. Because of my first hand experiences inside the Bin Laden clan and Saudi society, I am desperately pessimistic and apprehensive about the future. This fear – and outrage – is also based on my conviction that the complex and tightly run networks of

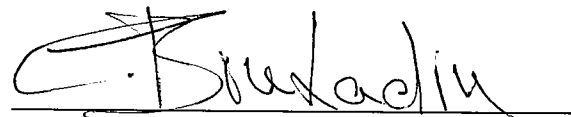
the Bin Laden clan and Saudi royal family continue to operate. Although Saudis often claim to be liberal, their beliefs and ideology are so strongly ingrained in them from an early age that they will always prevail. And if sometimes their thirst for power, greed and material interests can separate the brothers in a family like the bin Ladens, their shared beliefs and religious convictions always bring them back together.

42. The bin Ladens have never said they have rejected Osama completely. Would they deprive him of his share and divide it among themselves? Under Sharia law that could only be done for a recognized religious offense. As the justice system in Saudi Arabia is ruled by Sharia, I don't believe that any Saudi court would deprive Osama of his inheritance on these grounds.

43. The bin Ladens and the princes work together, very closely. They are secretive, and they are united.

FURTHER THE AFFIANT SAYETH NOT.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 1 day of FEB, 2006.


CARMEN BIN LADIN

Seen by the undersigned, Me Eric DEMIERRE, a duly authorised Notary Public in Geneva, Switzerland, for legalisation exclusively of the above signature of Mrs Carmen BIN LADIN. Geneva, this 1st day of February, 2006.

